1	S. BRENT VOGEL	
2	Nevada Bar No. 6858 Brent.Vogel@lewisbrisbois.com	
3	BRIGETTE E. FOLEY Nevada Bar No. 12965	
4	Brigette.Foley@lewisbrisbois.com	
5	LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600	
6	Las Vegas, Nevada 89118 Tel.: 702.893.3383	
7	Fax: 702.893.3789	
8	Attorneys for Defendant Correct Care Solutions, LLC	
9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11		
12	ROSEN MARIANO, An individual,	Case No. 2:18-cv-01911-APG-EJY
	·	0d30 No. 2.10-04-01311-711 G-E01
13	Plaintiff, vs.	STIPULATION AND ORDER TO
14	THE CITY OF LAS VEGAS, a political	EXTEND DEADLINE FOR DEFENDANT CORRECT CARE SOLUTIONS, LLC TO
15	subdivision of the State of Nevada,	FILE REPLY IN SUPPORT OF
16	CORRECTIONAL HEALTHCARE COMPANIES, INC., A Foreign	RENEWED MOTION FOR SUMMARY JUDGMENT [ECF NO. 92]
17	Corporation, CORRECT CARE SOLUTIONS LLC, A Foreign Limited	
18	Liability Company, MICHELLE FREEMAN,	(SECOND REQUEST)
19	Chief of Detention Enforcement for the City of Las Vegas, CORRECTION OFFICER	
20	DOE 1-10, HEALTCH CARE WORKER DOES 11-20, DOES 21-99 inclusive, ROE	
21	CORPORATIONS 100-199, inclusive,	
22	Defendants.	
23		
24	IT IS HEREBY STIPULATED AND AGREED, between the Parties, by and through	
25	their respective counsel of record, that the deadline for Defendant Correct Care Solutions,	
26	LLC to file its Reply Brief in Support of Defendant Correct Care Solutions, LLC's Renewed	
27	Motion for Summary Judgment (ECF No. 92) will be extended three (3) days from March	

**28** 

10, 2023 to March 13, 2023.

The Motion was filed on January 20, 2023. Plaintiff filed his Response to the Motion 1 on February 21, 2023 (ECF. No. 100). This is the Parties' second request to extend time. 2 3 This Stipulation and [Proposed] Order is submitted in accordance LR IA 6-1. The Parties respectfully request this brief extension of time because counsel for the 4 5 Defendant had a family emergency to attend to and expects to be out of the office through the weekend, returning Monday March 13, 2023. The Parties' requested extension is not 6 made in bad faith or to unnecessarily delay these proceedings. Therefore, the Parties 7 respectfully request the Court approve the foregoing stipulation. 8 9 LEWIS BRISBOIS BISGAARD & SMITH LLP 10 11 DATED this 10<sup>th</sup> day of March, 2023. DATED this 10<sup>th</sup> day of March, 2023. 12 13 PRINCE LAW GROUP LEWIS BRISBOIS BISGAARD & SMITH 14 /s/ Andrew Brown Melanie L. Thomas #12576 for /s/ S. BRENT VOGEL DENNIS M. PRINCE 15 Nevada Bar No. 5092 Nevada Bar No. 6858 ANDREW R. BROWN BRIGETTE E. FOLEY 16 Nevada Bar No. 15875 Nevada Bar No. 12965 10801 W. Charleston Blvd., Suite 560 6385 S. Rainbow Blvd., Suite 600 17 Las Vegas, Nevada 89135 Las Vegas, Nevada 891118 Attorneys for Plaintiff Attorneys for Defendant 18 Rosen Mariano Correct Care Solutions, LLC 19 DATED this 10<sup>th</sup> day of March, 2023. 20 LAS VEGAS CITY ATTORNEY'S OFFICE 21 22 23 BRADFORD R. JERBIC Nevada Bar No. 1056 24 JOHN A. CURTAS Nevada Bar No. 1841 25 495 S. Main Street, 6th Floor Las Vegas, Nevada 89101 26 Attorneys for Defendants City of Las Vegas and Michelle Freeman 27 28

BRISBOIS
BISGAARD
& SMITH LLP
ATTORNEYS AT LAW

Rosen Mariano v. Correct Care Solutions, LLC, et al. 1 Case No. 2:18-cv-01911-APG-EJY Stipulation and [Proposed] Order to Extend Deadlines 2 **ORDER** 3 IT IS SO ORDERED. 4 5 DATED: March 13, 2023 6 7 8 9 UNITED STATES DISTRICT JUDGE **10** 11 12 13 Respectfully submitted by: DATED this 10<sup>th</sup> day of March, 2023. 14 LEWIS BRISBOIS BISGAARD & SMITH LLP 15 16 Melanie L. Thomas #12576 for 17 S. BRENT VOGEL Nevada Bar No. 6858 19 **BRIGETTE E. FOLEY** Nevada Bar No. 12965 **20** 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 21 Tel. 702.893.3383 Attorneys for Defendant Correct Care Solutions, LLC 22 23 24 25 26 27 28

BRISBOIS BISGAARD & SMITH LLP